

# Active Shooter

Developing an effective plan.



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A report by Gallagher

**25%** of companies are unprepared for active shooter incidents.

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**80%** of active shooter incidents occur in the workplace.

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**2M** Americans are victims of workplace violence annually.

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You are **18** times more likely to experience a workplace violence incident than a fire.

Unfortunately, workplace violence is becoming an ever-increasing liability in the workplace. Despite the presence of workplace violence prevention programs intended to avoid this hazard entirely, it is becoming all too frequent that there may be an active shooter incident at the workplace. This report will provide a discussion of the elements of an effective active shooter plan as well as an example that can be used to develop an actual policy.

As the pace and emotional pressures of everyday life impact both employees at home and in the workplace, as well as unknown individuals, a distressing and tragic trend is occurring—employees and unknown individuals are unable to control their emotions at work, or have ulterior criminal motives, and violence erupts toward co-employees, customers or third parties. The unfortunate statistics show that homicide is the number one cause of death for women in the workplace and the third overall cause for men and women. In many cases, these acts of violence occur as employees face the prospect of layoffs and corporate reorganizations in many industries.

No employer wants such incidents to occur. Ironically, as employers struggle to avoid these potential legal liabilities through creation and enforcement of employment policies, they are met with a host of federal and state laws which may protect certain employee conduct. More importantly, since an employer has no objective “litmus test” for predicting which employee may become violent under particular triggering circumstances, there is no foolproof way to effectively eliminate the hazard. Likewise, an employer cannot predict whether unknown individuals may decide to commit random acts of violence because of mental and emotional conditions or for misguided political or religious motivations.

## Developing a policy

Under OSHA's General Duty Clause, an employer is required to protect its employees against “recognized hazards likely to cause serious injuries or death.” As such, an employer should consider developing a Workplace Violence Prevention and Response Policy.

In developing its policy, the employer should, at minimum, include these elements:

- A stated management commitment to protecting employees against the hazards of workplace violence, including both physical acts and verbal threats;
- A statement that the employer has a “zero tolerance” policy toward threats or acts of violence and will take appropriate disciplinary action against employees who engage in such conduct;
- Identify means and methods for employees to notify the employer of perceived threats of violent acts in a confidential manner;
- Establish a means to promptly investigate all such threats or violent acts;
- Develop consistent, firm discipline for violations of the policy;

## Signs of Potential Violent Behavior

- Sudden changes in demeanor
- Physical complaints against people or groups
- Depression or withdrawal
- Emotional responses to innocuous comments
- Paranoia
- Comments about suicide or wanting “to show someone”
- Comments about firearms in conjunction with violent crimes
- Increased use of alcohol and drugs
- Absenteeism
- Disregard to work quality or company policy

- Implement a nonretaliation policy for employees who report verbal and physical conduct to the employer, which they reasonably believe represents a threat of potential workplace violence;
- Establish a team of qualified individuals (e.g., human resources, risk managers, legal, medical, security) either within the company or readily available third parties to respond to a potential or actual incident; and
- Consider establishing an Employee Assistance Plan (EAP) to provide assistance to employees who may be experiencing mental or emotional stress before an act of violence occurs.

Unfortunately, despite the fact that many employers have developed workplace violence prevention and response policies, there have been instances where an “active shooter,” an employee or an unknown individual, has come to the premises and utilized a firearm to attempt to harm employees and other persons. In anticipation of such a possibility, the employer should consider developing an Active Shooter Emergency Response Policy to inform employees of the three courses of action to take in such instances and how to react when law enforcement arrives.

The below policy sets out recommendations gathered from the Department of Homeland Security, the Federal Bureau of Investigation, other law enforcement agencies and recognized industry sources. Employers should consider developing such a policy, utilizing the enclosure, while customizing it to the employer’s worksite.

## Active Shooter Emergency Response Policy Sample

### Purpose

This policy is intended to provide guidance in the event an individual is actively shooting persons at the workplace and to comply with applicable regulations of the Occupational Safety and Health Administration (OSHA).

### Policy

It is the policy of the Company to provide an active shooter emergency response plan to alert employees that an active shooter appears to be actively engaged in killing or attempting to kill people at the workplace.

### Definitions

For purposes of this Policy: An active shooter is defined as a person or persons who appear to be actively engaged in killing or attempting to kill people at the Company’s premises. In most cases, active shooters use a firearm(s) and display no pattern or method for selection of their victims. In some cases, active shooters use other weapons and/or improvised explosive devices to harm additional victims and act as an impediment to police and emergency responders. These improvised explosive devices may detonate immediately, have delayed detonation fuses or detonate on contact.





## Procedures

1. The first employee to identify an active shooter situation: As soon as possible, should call the Company emergency number ( \_\_\_\_\_ ) and announce a prearranged code (e.g., “Active Shooter”) (with the location of the incident) and a physical description of the person(s) with the weapon, and type of weapon, if known.
2. The emergency operator upon notification will: Provide a public announcement “Code \_\_\_\_\_ (and the location)” on the public address system.
3. The emergency operator or any employee who is at a location distant from the active shooter, such as in a different area or floor, will contact 911.
4. The phone call to 911 (from the area where the caller is safely concealed) should provide the following information to the police:
  - a. Description of suspect and possible location
  - b. Number and types of weapons
  - c. Suspect’s direction of travel
  - d. Location and condition of any victims

## Potential Responses

In response to an active shooter event, there will be three potential courses of action: evacuate, hide out, self-defense. The following guidelines identify these courses of action:

### Evacuate

If there is an accessible escape path, attempt to evacuate the premises, following these recommendations:

- Have an escape route and plan in mind
- Evacuate regardless of whether others agree to follow
- Leave your belongings behind
- Help others escape, if possible
- Prevent individuals from entering an area where the active shooter may be
- Keep your hands visible
- Follow the instructions of any police officers
- Do not attempt to move wounded people
- Call 911 when you are safe

Mass shootings are  
**2.4** times greater  
than the previous  
decade.

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**1 per week—**  
Average active  
shooter incidents  
in the U.S.

### Hide Out

If evacuation is not possible, find a place to hide where the active shooter is less likely to find you, with the recommendations listed below.

The hiding place should:

- Be inconspicuous
- Be out of the active shooter's view
- Provide physical protection if shots are fired in your direction (e.g., locating into a bathroom and locking the door, staying as low to the floor as possible and remaining quiet and motionless)
- Not trap yourself or restrict your options for movement

To prevent an active shooter from entering the hiding place:

- Lock the door
- Blockade the door with heavy furniture

If the active shooter is nearby:

- Lock the door
- Silence cell phones and/or pagers
- Turn off any source of noise (e.g., radios, televisions)
- Hide behind large items (e.g., cabinets, desks)
- Remain quiet and motionless

### Self-Defense

If it is not possible to evacuate or hide, then consider self-defense, with these recommendations:

- Remain calm
- Dial 911, if possible, to alert police to the active shooter's location
- If you cannot speak, leave the line open and allow the 911 dispatcher to listen

Take action against the active shooter and only when you believe your life is in imminent danger, attempt to disrupt and/or incapacitate the active shooter as follows:

- Acting as aggressively as possible against him/her
- Throwing items and improvising weapons
- Yelling
- Commit yourself to defensive physical actions



- Comply with police instructions.
- Remain calm and do not scream.
- Put down any items you are holding, raise your hands and keep them visible, and avoid any quick movements.
- Provide police with important information when they arrive.

### Law Enforcement Response

The police will arrive to respond to the emergency; follow these recommendations:

- Comply with the police instructions. The first responding officers will be focused on stopping the active shooter and creating a safe environment for medical assistance to be brought in to aid the injured.
- When the police arrive at your location:
  - Remain calm and follow officers' instructions
  - Put down any items in your hands (e.g., bags, jackets)
  - Immediately raise your hands and spread your fingers
  - Keep your hands visible at all times
  - Avoid making quick movements toward officers, such as attempting to hold onto them for safety
  - Avoid pointing, screaming and/or yelling
  - Do not stop to ask officers for help or direction when evacuating, just proceed in the direction from which officers are entering the area or to an area to which they direct you
  - Notify Company representatives that you have evacuated the premises
- When the police arrive, the following information should be available:
  - Number of shooters
  - Number of individual victims and any hostages
  - The type of problem causing the situation
  - Type and number of weapons possibly in the possession of the shooter
  - All necessary Company representatives still in the area as part of the company's emergency management response
  - Identity and description of participants, if possible
  - Keys to all involved areas as well as floor plans
  - Locations and phone numbers in the affected area

### Post-Incident Action

When the police have determined that the active shooter emergency is under control, the emergency operator will provide a public announcement that the emergency is over by using a prearranged Code (e.g., "All Clear").

### Police Investigation

After the police have secured the premises, the Company will arrange to have designated management representatives participate in the law enforcement investigation of the incident, including identifying witnesses and providing requested documents.

Monitor your workplace and remain aware of building activities and conditions.

Watch for suspicious people that:

- Enter secure areas without proper identification, uniform or safety gear.
- Are in the wrong place or seem lost.
- Appear overdressed for weather conditions.
- Loiter, watch, photograph or video people and operations.
- Act in a disorderly manner that alarms or disturbs others.

#### **Medical Assistance**

The Company will designate management representatives who will engage with emergency responders who provide medical assistance to injured employees, including ensuring that all required medical benefit and insurance documentation is provided.

#### **Notification of Relatives**

The Company will designate management representatives to notify relatives of any injured employees in a timely fashion.

#### **OSHA**

In the event that there is a fatality or one employee is hospitalized for treatment, OSHA must be notified. If there is a fatality, OSHA must be notified within eight (8) hours. In the event of a hospitalization of one employee for treatment, OSHA must be notified within twenty-four (24) hours. In addition, if the fatality or injury is work-related, the Company may have to record the incident on its OSHA 300 Log within seven (7) calendar days.

#### **Media**

The Company will designate management representatives who will respond to any media requests for information. Such representatives will carefully consider the nature of any such requests in order to avoid disclosing information about any person that is confidential and protected by federal and state privacy and medical information laws and regulations and interfering with any ongoing police or internal Company investigation.

## Preparing for an Active Shooter Situation

It is extremely important to have a plan in place to respond to this type of situation. Reacting quickly when gun shots are heard or a shooting is witnessed is vital. Your plan should include the following:

- An evacuation procedure from all areas of your building, including designated assembly points and maps showing primary and secondary escape routes
- Designated safe points and hiding places within the building
- Discuss what communication options are available with your local police and include them in your plan
- Contact information for emergency responders and local hospitals, including distances away from your building, phone numbers and contact people
- Contact names and phone numbers of management and building personnel
- Discuss how to alert employees about an incident (will you use a code word over the public address system, an all-call phone alert or text messages?)
- Evaluate your workplace for potential threats
- Assess current security equipment and protocols

**\$3 or more** is saved for each dollar invested in workplace safety.

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Annual comprehensive cost to organizations after an incident is **\$130B.**

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**\$3M** is the average jury award for workplace violent incident lawsuits.

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**1.8M**—the number of estimated work days missed each year due to workplace violence.

**Once you have response procedures in place:**

- Create a written plan and distribute to employees with responsibility for emergency management
- Train employees on these procedures, including mock drills coordinated with local police
- Evaluate the effectiveness of the drill and adjust your plans and training as needed.

To conclude, the following steps are recommended to ensure that your organization is more resilient in the event of a crisis:

- Engage specialists to ensure that crisis coverage is appropriate and fully understood
- Make plans to have 24/7 access to the right external expertise
- Continue to rehearse crisis plans

For more information, response planning guides and training resources, go to the Department of Homeland Security website at <http://www.dhs.gov/active-shooter-preparedness>.



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